

### REMARKS

The office action and the references cited therein have been carefully reviewed together with the present application and amendments have been made to the specification and claims to place the application in condition for allowance. More particularly, the abstract has been amended to comply with the word requirement and the objected to phraseology has been removed. The grammatical errors that the examiner noted have been corrected. Claim 2 has been deleted and several claims have been amended to more accurately define the present invention in a manner that emphasizes pre-existing differences in an effort to place the application in condition for immediate allowance.

The examiner has rejected claims 1 and 3-8 as being anticipated by the Cook et al. patent (hereinafter "Cook"). It is strongly believed that Cook does not anticipate, teach or suggest Claims 1 and 3-8 as amended. The requirements for an anticipation are quite rigorous as the Court of Appeals for the Federal Circuit decisions have established over the years. An invention is anticipated if the same device, including *all* the claim limitations, is shown in a single prior art reference. *Scripps Clinic and Research Found. v. Genentech, Inc.*, 927 F.2d 1565, 1576 (Fed. Cir. 1991); *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989); *Connell v. Sears, Roebuck & Co.*, 722 F.2d 1542, 1548 (Fed. Cir. 1983). The *identical* invention must be shown by the prior art reference in as much detail as is contained in the patent claim. *Richardson v. Suzuki Motor Co., Ltd.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989); *Continental Can Co. v. Monsanto Co.*, 948 F.2d 1264, 1267 (Fed. Cir. 1991); *Titanium Metals Corp. v. Banner*, 778 F.2d 775, 780 (Fed. Cir. 1985).

Currently amended claim 1 is directed to a system for providing product service and support information to a user including automatically customizing an interactive training sequence, comprising, *inter alia*, said system presenting at least one set of predefined questions

to the user for gathering predefined information about the user, as well as a customization module for customizing the content of said training sequence responsive to the user's responses to said set of predefined questions, and wherein said system storing at least one login identification supplied by the user for uniquely linking said customized training sequence to the user. Cook simply does not anticipate, teach or suggest a system having this defined structure and functionality. Cook is a system for providing interactive adaptive individualized computer assisted instruction. It is a system where instructors teach students and students interact with the instructors in a very broad based and general way. There is largely unlimited interaction and flexibility that permits the instructor to do almost anything that he wants to in terms of teaching techniques. Cook has nothing to do with providing product service and support information. Cook also cannot operate in the claimed manner which automatically customizes an interactive training sequence in the manner stated. Moreover, Cook simply does not even remotely anticipate, teach or suggest "a customization module for customizing the content of said training sequence responsive to the user's responses to said set of predefined questions." Additionally, Cook certainly fails to anticipate, teach or suggest the claim elements "said system storing at least one login identification supplied by the user for uniquely linking said customized training sequence to the user." All of these operations are done automatically by the system, rather than by someone other than a user controlling events on a per user basis.

Perkowski also fails to teach or suggest claim 1 either independently or in combination with Cook. The language of the patents that the examiner has cited describes operability that is much different from the elements of the claim. The cited text actually emphasizes the substantial differences that exist between the references and the invention as claimed.

Similarly, claim 5 is directed to a method of operating a computer system for automatically customizing an interactive training sequence that provides product service and

support information to a user which comprises the steps of “providing a set of predefined questions to the user responsive to the user providing a unique login identification, the computer system receiving user responses to said set of predefined questions and the computer system returning a customized training sequence according to said user responses from said set of predefined questions, wherein said customized training sequence is linked to said unique login identification.” Clearly, neither Cook nor Perkowski even remotely anticipate, teach or suggest any of these steps, because they simply do not operate in this manner or in any way that even resembles this manner.

Claim 9 has been rejected under 35 U.S.C. 103 as being unpatentable over Cook and Perkowski. Neither of these references even remotely teach or suggest an interactive computer system for providing product service information to a user wherein the system “normally operates without human involvement” and comprises, *inter alia*, “a simulator module for playing at least one interactive animated simulation in a user understandable format responsive to user selection, a customization module for customizing an interactive training sequence responsive to a user response to a set of predefined questions” or “a training module for playing said customized interactive training sequence in a user understandable format responsive to user selection.”

The language of the patents that the examiner has cited describes operability that is much different from the elements of the claim. The cited text actually emphasizes the substantial differences that exist between the references and the invention as claimed. Neither of these references, singularly or in combination, teaches or suggests the system as claimed for the simple reason that neither of them operate in a manner that is even close to the manner defined by the claim.


With regard to claim 27, it is directed to a computer system for providing an interactive product service manual, said system normally operating without human intervention and comprising, *inter alia*, "means for customizing an interactive training sequence responsive to user response to a set of predefined questions and means for displaying said customized interactive training sequence responsive to user selection." Neither the Cook nor Perkowski references even remotely operate in this manner and certainly cannot teach or suggest this system as claimed.

With regard to claim 28, it is directed to a method for providing an interactive product service manual having at least one documentation, at least one interactive animated simulation and at least one training sequence customized by the user, said method being executed by a computer system connected to a LAN comprising the steps of, *inter alia*, customizing an interactive training sequence responsive to user responses to a set of predetermined predefined questions and playing said customized interactive training sequence responsive to user selection.

The dependent claims necessarily include the subject matter of the claims from which they depend, as well as additional features and/or functionality that is not found in those claims and are therefore also in condition for allowance. For the foregoing reasons, reconsideration and allowance of all claims presenting pending in the application is respectfully requested.

Respectfully submitted,

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